

RECEIVED
U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

AUG 15 2024

(new
suit
Camp)

(Rev. 12/15/2023)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

DANIEL J. MCCOY, CLERK

ALEXANDRIA DIVISION

BY:

Arafat Ahmed

Civil Action No. 1:24-cv-1111 SEC. P

Plaintiff

Prisoner # A#220483420

VS.

Judge

Warden

Magistrate Judge

Defendant

COMPLAINT

BY PRISONER UNDER 28 U.S.C. § 1331 OR BIVENS V. SIX UNKNOWN NAMED
AGENTS OF THE FEDERAL BUREAU OF NARCOTICS, 403 U.S. 388 (1971)

I. Previous Lawsuits

a. Have you begun any other lawsuit while incarcerated or detained in any facility?

Yes ☒ No ☐

b. If your answer to the preceding question is "Yes," provide the following information.

1. State the court(s) where each lawsuit was filed (if federal, identify the District, if state court, identify the County or Parish):

United States District Court, Western District
of Louisiana.

2. Name the parties to the previous lawsuit(s):

Plaintiffs: Arafat Ahmed

Defendants: Warden

3. Docket number(s): 1:24-CV-00739-JE-JPM

4. Date(s) on which each lawsuit was filed: 05/31/2024

5. Disposition and date thereof [For example, was the case dismissed and when? Was it appealed and by whom (plaintiff or defendant)? Is the case still pending?]:

The case was denied on 08/02/2024

(Rev. 12/15/2023)

- c. Have you filed any lawsuit or appeal in any federal district court or appeals court which has been dismissed?

Yes _____ No ☒

If your answer to the preceding question is "Yes," state the court(s) which dismissed the case, the civil action number(s), and the reason for dismissal (e.g., frivolity, malice, failure to state a claim, defendants immune from relief sought, etc.).

II. a. Name of institution and address of current place of confinement:

Winn Correctional Center 560 Gum Springs Road, Winnfield, LA 71483

- b. Is there a prison grievance procedure in this institution?

Yes ☒ No _____

1. Did you file an administrative grievance based upon the same facts which form the basis of this lawsuit?

Yes ☒ No _____

2. If you did not file an administrative grievance, explain why you have not done so.

3. If you filed an administrative grievance, answer the following question. What specific steps of the prison procedure did you take and what was the result? (For example, for state prisoners in the custody of the Department of Public Safety and Corrections: did you appeal any adverse decision through to Step 3 of the administrative grievance procedure by appealing to the Secretary of the Louisiana Department of Public Safety and Corrections? For federal prisoners: did you appeal any adverse decision from the warden to the Regional Director for the Federal Bureau of Prisons, or did you make a claim under the Federal Tort Claims Act?)

I wrote a request to Warden and did not receive any proper answer.

Attach a copy of each prison response and/or decision rendered in the administrative proceeding.

III. Parties to Current Lawsuit:

- a. Plaintiff, Arafat Ahmed

Address Winn Correctional Center 560 Gum Springs Road, Winnfield, LA 71483

(Rev. 12/15/2023)

b. Defendant, ICE New Orleans field office, is employed as
Warden at Winn Correctional Center.

Defendant, Warden, is employed as

Warden at Winn Correctional Center.

Defendant, _____, is employed as

_____ at _____.

Additional defendants, _____

IV. Statement of Claim

State the **FACTS** of your case. Specifically describe the involvement and actions of each named defendant. Include the names of all persons involved in the incident(s) or condition(s) giving rise to this lawsuit, and the dates upon which and the places where the incident(s) and/or condition(s) occurred. **YOU ARE REQUIRED TO SET FORTH ONLY FACTUAL ALLEGATIONS. YOU ARE NOT REQUIRED TO SET FORTH LEGAL THEORIES OR ARGUMENTS. IF EXTRA PAGES ARE REQUIRED TO STATE THE FACTS OF YOUR CASE, YOU ARE LIMITED TO FIVE TYPEWRITTEN OR TEN LEGIBLE HANDWRITTEN PAGES PURSUANT TO LOCAL CIVIL RULE 3.2**

Winn Correctional Center allegedly accommodated the dietary needs of Christian, Hindu and Jewish inmates but failed to accommodate my own religious dietary (Halal Entrees) needs. I wrote grievance but did not received proper answer then I wrote request to Warden. Warden told me that "Halal Entrees" are available for purchase through Commissary whereas they provide "Kosher Entrees" for Jewish inmates free. I was treated differently than others detainees based on religion. Its violation of Fifth Amendment Equal Protection Clause. The impermissible factor (discrimination) involved in the prisoner's treatment was religion.

(Rev. 12/15/2023)

V. Relief

State exactly what you want the court to provide to you or do for you. Make no legal arguments. Cite no cases or statutes.

I, plaintiff demands judgment against defendant(s)
in the sum of \$100000.00 dollars and costs.

VI. Plaintiff's Declaration

- a. I understand that if I am transferred or released, I must apprise the Court of my address, and my failure to do so may result in this complaint being dismissed.
- b. I understand that I may not proceed without prepayment of costs if I have filed three lawsuits and/or appeals that were dismissed on grounds that the action and/or appeal was frivolous or malicious, or failed to state a claim upon which relief may be granted, unless I am in imminent danger of serious physical injury.
- c. If I am located in a prison participating in the Electronic Filing Pilot Program, I consent to receive orders, notices and judgments by Notice of Electronic Filing.

Signed this 13 day of August, 20 24.

A#220483420

**Prisoner no. (Louisiana Department of
Corrections or Federal Bureau of Prisons)**



Signature of Plaintiff

JUL 10 2024

Pick Up Date: _____

WRITE LEGIBLE / ESCRIBIR LEGIBLE

Date of Delivery to Officer: _____

LA SALLE CORRECTIONAL CENTER

DETAINEE REQUEST TO ICE (FORMULARIO DE PETICION PARA ICE)

Name (Nombre): Arafat AhmedAlien Number (Numero De Inmigracion): 220483420 Country (Pais): BangladeshHousing Unit (Dormitorio): C-D1-56 Fecha: 07/10/2024

Please state your specific question or concern completely. Do not simply request to speak to an ICE officer. You must write this form and you will receive a response.

Escriba su pregunta especifica aqui. Usted necesita escribir su pregunta en este formulario y usted recibira una respuesta.

Please check the correct Box:

- | | | | |
|---|---|---|--|
| <input checked="" type="checkbox"/> Warden / Guardian | <input type="checkbox"/> Assistant Warden / Assistant Guardian | <input type="checkbox"/> Major / Mayor | <input type="checkbox"/> Mail Room / Correo |
| <input type="checkbox"/> Classification / Clasificacion | <input type="checkbox"/> Property / Propiedad | <input type="checkbox"/> Legal | <input type="checkbox"/> Food Service / Servicio de comida |
| <input type="checkbox"/> ESL / Education | <input type="checkbox"/> ICE Case Manager / Clasificacion de ICE | <input type="checkbox"/> Medical/Medico | <input type="checkbox"/> Detainee Banking / Banco del detainee |
| <input type="checkbox"/> Library / Biblioteca | <input type="checkbox"/> Counselor / Psicoterapeuta | <input type="checkbox"/> Laundry / Lavanderia | <input type="checkbox"/> Law Library / Ley Biblioteca |
| <input type="checkbox"/> Chaplain / Pastor | <input type="checkbox"/> Immigration Court / Corte de Inmigración | | |

QUESTION(PREGUNTA): Dear Sir, As a detainee I have the rights to get my religious diet. I requested chaplain many times but didnot get proper respond. Medical put me in Medical diet, but I got the regular food. I didnot get any Medical diet food. It's been long time I am here but getting any response. I Hope you please respond me and order the chaplain to sorder 'Halal' food for me according to my religion. Please. Thankyou to Consider my request. I look forward from hearing from you shortly.

RESPONSE (RESPUESTA): You are recieving your approved religious diet - "Common Yare" Menu. Halal Entrees are available for purchase through commissary.

OFFICER: Akuse DATE RESPONDED: 7/10/24Date Forwarded Back to Detainee: 7/10/24